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1/23/03
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IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

BEVERLY BEAM

Plaintiff

vs.

SCOTT DOWNEY, ROGER
MORRISON, DAVID GRAYBILL
AND MICHAEL SWEGER

Defendants

NO. 1:CV-01-0083

J. McClure

CIVIL ACTION - LAW

JURY TRIAL DEMANDED

FILED
HARRISBURG, PA

JAN 22 2003

MARY E. D'ANDREA, C
Per *[Signature]*
Deputy Clerk

TO THE CLERK OF COURTS:

Attached hereto please find Affidavits in support of Defendants Graybill and Sweger's application for attorney's fees under the above-captioned matter.

SERRATELLI, SCHIFFMAN, BROWN
& CALHOON, PC

By: *[Signature]*
Steven J. Schiffman, Esquire

I.D. No.: 25488

Melanie L. Erb, Esquire

I.D. No.: 84445

Suite 201, 2080 Linglestown Road

Harrisburg, PA 17101

(717) 540-9170

Attorneys for Defendants David Graybill

And Michael Sweger

Dated: 1/22/03

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

BEVERLY BEAM	:	NO. 1:CV-01-0083
	:	
Plaintiff	:	
	:	
vs.	:	
	:	CIVIL ACTION - LAW
SCOTT DOWNEY, ROGER	:	
MORRISON, DAVID GRAYBILL	:	JURY TRIAL DEMANDED
AND MICHAEL SWEGER	:	
	:	
Defendants	:	

**AFFIDAVIT OF
DEBRA K. WALLET**

1. Under penalty of perjury and pursuant to 28 USC §1746, I state and depose as follows:
2. I have been engaged in the private practice of law for over twenty years in the Harrisburg, Pennsylvania area and the Middle District of Pennsylvania.
3. My practice and that of my firm involve, among other areas, civil litigation, and civil rights litigation in particular.

4. In the course of my career, I have come to know Melanie L. Erb, Esquire, and I am familiar with her experience, skill, and reputation. I am furthermore familiar with these factors as they relate to her civil litigation and civil rights practice.

5. Based upon my familiarity with Ms. Erb and my knowledge of her reputation in the legal community, I state that her legal experience and talent are exceptionally high and that her reputation in the community is excellent.

6. I believe that in this community, an hourly billing rate of \$125.00 per hour is reasonable and within prevailing community standards for lawyers with Ms. Erb's experience and ability.

RESPECTFULLY SUBMITTED,

By: Debra K. Warr

Dated: 1/22/03

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

BEVERLY BEAM	:	NO. 1:CV-01-0083
	:	
Plaintiff	:	
	:	
vs.	:	
	:	CIVIL ACTION - LAW
SCOTT DOWNEY, ROGER	:	
MORRISON, DAVID GRAYBILL	:	JURY TRIAL DEMANDED
AND MICHAEL SWEGER	:	
	:	
Defendants	:	

**AFFIDAVIT OF
DEBRA K. WALLET**

1. Under penalty of perjury and pursuant to 28 USC §1746, I state and depose as follows:
2. I have been engaged in the private practice of law for over twenty years in the Harrisburg, Pennsylvania area and the Middle District of Pennsylvania.
3. My practice and that of my firm involve, among other areas, civil litigation for Defendants, and civil rights litigation in particular.

4. In the course of my career, I have come to know Steven J. Schiffman, Esquire, and I am familiar with his experience, skill, and reputation. I am furthermore familiar with these factors as they relate to his civil litigation and civil rights practice.

5. Based upon my familiarity with Mr. Schiffman and my knowledge of his reputation in the legal community, I state that his legal experience and talent are exceptionally high and that his reputation in the community is excellent.

6. I believe that in this community, an hourly billing rate of \$175.00 per hour is reasonable and within prevailing community standards for lawyers with Mr. Schiffman's experience and ability.

RESPECTFULLY SUBMITTED,

By: Debra K. Weber

Dated: 1/22/03

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

BEVERLY BEAM

NO. 1:CV-01-0083

Plaintiff

vs.

CIVIL ACTION - LAW

**SCOTT DOWNEY, ROGER
MORRISON, DAVID GRAYBILL
AND MICHAEL SWEGER**

JURY TRIAL DEMANDED

Defendants

**AFFIDAVIT OF
DANIEL STERN**

1. Under penalty of perjury and pursuant to 28 USC §1746, I state and depose as follows:
2. I have been engaged in the private practice of law for over twenty years in the Harrisburg, Pennsylvania area and the Middle District of Pennsylvania.
3. My practice and that of my firm involve, among other areas, civil litigation.

4. In the course of my career, I have come to know Steven J. Schiffman, Esquire, and I am familiar with his experience, skill, and reputation. I am furthermore familiar with these factors as they relate to his civil litigation and civil rights practice.

5. Based upon my familiarity with Mr. Schiffman and my knowledge of his reputation in the legal community, I state that his legal experience and talent are exceptionally high and that his reputation in the community is excellent.

6. I believe that in this community, an hourly billing rate of \$175.00 per hour is reasonable and within prevailing community standards for lawyers with Mr. Schiffman's experience and ability.

RESPECTFULLY SUBMITTED,

By: Daniel Stern
Daniel Stern

Dated: 1/22/03

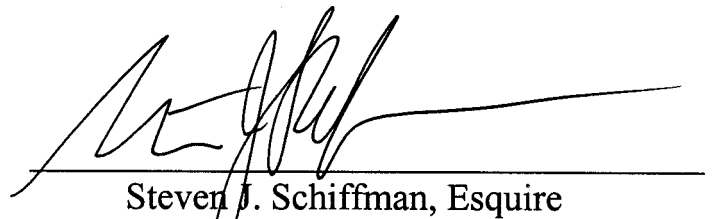
CERTIFICATE OF SERVICE

I, Steven J. Schiffman, Esquire, hereby certify that I have served a true and correct copy of the foregoing document by depositing such in the regular U.S. Mail, addressed as follows:

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4311 N. Sixth Street
Harrisburg, PA 17110

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Mette, Evans & Woodside
3401 N. Front Street
Harrisburg, PA 17110

Stephen S. Russell, Esquire
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(717) 540-9170

Dated: January 22, 2003